

## **REMARKS**

### OVERVIEW

Claims 1-17 are pending in this application. Claims 1, 13, 14, 15, and 17 have been amended. The present response is an earnest effort to place the application in proper form for allowance. Reconsideration and passage to issuance is therefore respectfully requested.

### SPECIFICATION

The Examiner has objected to the disclosure due to informalities. In particular, the Examiner indicates that on page 1, "a business unit is simply refers..." includes extra verbage. This phrase has been amended to remove the --is--.

On page 17 the disclosure refers to "...service 100 associated with a stateless session bean one of two" which the Examiner indicates should read "...service 100 associated with a stateless session bean 102." This amendment to the specification has been made.

One page 18, the specification refers to "...contact date 134..." whereas Figure 8 refers to "contract data 134". Page 18 has been amended to refer to "contract data" to be consistent with Figure 8.

Therefore it is respectfully submitted that all objections to the specification have been remedied.

### DRAWINGS

The Examiner objects to the drawings because Figure 1 refers to Item 12 as Call Center App whereas the specification refers to Item 12 as Contact Center Application (page 8). Figure 1

has been amended to refer to a "Contact Center App". Therefore it is respectfully submitted that this objection to the drawings has been remedied.

The Examiner indicates that Figure 8 refers to 3 items labeled as "Contract Data" but labeled 134, 136, and 138 with different names assigned on page 18 of the specification, specifically contact data 134, client file data 136, and agent data 138. Figure 8 has been amended to be consistent with page 18 of the specification. Therefore it is respectfully submitted that this objection has been remedied.

Also, the Examiner indicates that item 60, 62, 64, 124, 126, 128, 130, 132, 140, and 142 in the figures are not mentioned in the description. Therefore these reference numerals have been removed from Figures 5 and 8. Therefore, it is respectfully submitted that these rejections have been overcome.

Accompanying this application are amended replacement drawing sheets. It is respectfully submitted that all objections have been overcome.

## CLAIM OBJECTIONS

Claim 15 (The Office Action indicates claim 13, but it is believed that it is claim 15) is objected to because the preamble is inconsistent with the base claim. Therefore, claim 15 has been amended.

## ISSUES UNDER 35 U.S.C. § 101

Claims 1-6 have been rejected under 35 U.S.C. § 101 because the claimed invention is alleged to be directed towards a non-statutory subject matter. In particular, the Examiner alleges that claims 1-6 are directed to software per se which is non-statutory subject matter. The

Examiner has failed to set forth a *prima facie* case, therefore this rejection should be withdrawn on that basis. If the Examiner does not withdraw the rejection, the Examiner is asked to identify the features of the invention that would render the claimed subject matter statutory if recited in the claim. MPEP § 2106. In addition, claim 1 has been amended to recite a "computer-implemented" system. Therefore, this rejection should be withdrawn for this independent reason as well.

Claim 17 has been rejected under 35 U.S.C. § 101 because the claimed invention is alleged to be directed towards a non-statutory subject matter. The Examiner indicates that claim 17 is directed to a software article and software per se is non-statutory subject matter. This rejection is respectfully traversed. In particular, the Examiner has not set forth a case of *prima facie* unpatentability as explained in MPEP § 2106. Thus, it is requested that this rejection be withdrawn on that basis. In addition, the Examiner has not indicated the features of the invention which would render the claimed subject matter statutory if recited in the claims. If the Examiner persists on this rejection, such an indication is requested.

#### ISSUES UNDER 35 U.S.C. § 112

Claims 1-6 are rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicant regards as the invention. In particular, the Examiner indicates the preamble recites "the system...". However, the body of the claim refers to a data base and software (applications). Thus, it is unclear what kind of physical elements constitute the claimed system. For clarity, claim 1 has been amended to recite a "computer-implemented system." Therefore, it is respectfully submitted that these rejection be withdrawn.

## ISSUES UNDER 35 U.S.C. § 102

Claims 1-2 and 13-14 have been rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,696,906 to Peters et al. (further referred to as Peters).

Peters is directed towards an integrated computerized system which creates, maintains, processes, and analyzes data regarding individual users for telecommunication services (Abstract; col. 1, lines 5-14).

Peters is directed towards managing information amongst separate departments of a business as opposed to separate business units. Claim 1 is directed towards "enterprise wide client interaction management across a plurality of business units". Peters does not disclose the idea of enterprise wide client interaction across separate business units. To further clarify that a business unit and a department are different, claim 1 has been amended to recite "each of the business units maintaining separate accounts associated with clients" and that the client interaction information is "associated with the separate accounts of the at least one of the business units". Peters does not disclose that its departments have separate accounts with clients. Thus, this rejection to claim 1 must be withdrawn. As claim 2 depends from claim 1 this rejection must also be withdrawn.

Claim 13 has been amended to recite "each of the business units maintaining separate client accounts" and "the data base containing shared client interaction information and client interaction information specific to at least one of the business units and the separate client accounts of the at least one business units." For the reasons previously expressed, Peters does not disclose multiple business units and does not disclose each department having separate

accounts with clients. Therefore this rejection to claim 13 must be withdrawn. As claim 14 depends from claim 13, this rejection must also be withdrawn.

There is an independent reason for patentability of claim 14. In particular, Peters does not disclose "an insurance unit, a retirement planning unit, a pension planning, or a mortgage unit. Therefore this rejection must be withdrawn for this independent reason as well.

Claim 17 has been rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,574,634 to Stauber et al. This rejection is respectfully traversed.

Claim 17 requires "means in the medium for creating a user interface for the software, the user interface having objects that comprise a free structure for displaying account information in hierarchical form". Stauber et al. does not disclose this limitation. The Examiner cites to Figures 2-3; column 4, lines 40-58 as disclosing this limitation. (Office Action, p. 8). However, Figures 2 and 3 illustrate the tiers of the application (col. 6, lines 19-22). Col. 4, lines 40-58 is a summary of the invention and does not disclose the element of claim 17. Therefore, it is respectfully submitted that this rejection to claim 17 must be withdrawn.

#### ISSUES UNDER 35 U.S.C. § 103

Claims 3-6 and 15-16 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Peters as applied to claims 1 and 13 and further in view of U.S. Patent No. 6,574,635 to Stauber et al. The deficiencies of Peters with respect to claims 1 and 13 have already been discussed. Stauber does not remedy these deficiencies and thus the rejections must be withdrawn.

Claims 7-8 and 11-12 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Peters.

Peters does not disclose "restricting the representative's ability to access a first customer information field based on a second customer information field". The Examiner parses this element into two separate element in making this rejection. In doing so the Examiner appears to lose sight of the element as a whole as well as the claimed invention as a whole. The Examiner's Official Notice and examples appear to be based on restricting access to a representative based on information associated with the representative (i.e. the partner is a junior partner, the bank employee is an average teller, the specialty of the sales representative). As the claim indicates the restriction is "based on a second customer information field".

Moreover, the Examiner's alternative reasoning is that "it would have been obvious ... to have automated the method of using a computer system to determine who might service" an account. (Office Action, p. 11). Such reasoning is not applicable as the claim is not directed towards selecting who can service an account. For all these reasons, this rejection should be withdrawn.

Claims 9-10 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Peters as applied to claim 7 above, and further in view of U.S. Publication No. 2002/0156842 to Sitnes et al. These rejections are respectfully traversed. In particular, neither Peters nor Sitnes alone or in combination disclose the step of "restricting the representative's ability to access a first customer information field based on a second customer information field", of claim 7 from which these claims depend. Therefore, these rejections should be withdrawn.

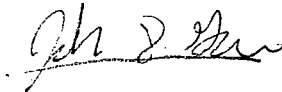
This is a request under the provision of 37 CFR § 1.136(a) to extend the period for filing a response in the above-identified application for three months from January 3, 2007 to April 3,

2007. Applicant is a large entity; therefore, please charge Deposit Account number 26-0084 in the amount of \$1,020.00 to cover the cost of the three months extension. Any deficiency or overpayment should be charged or credited to Deposit Account 26-0084.

No other fees or extensions of time are believed to be due in connection with this amendment; however, consider this a request for any extension inadvertently omitted, and charge any additional fees to Deposit Account No. 26-0084.

Reconsideration and allowance is respectfully requested.

Respectfully submitted,



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